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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ALBERT COLLINS,

17 Defendant.

Case No. 3:21-cr-00463-VC-1

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE MTD
DEADLINES**

Dept.: Courtroom 4 – 17th Floor

Judge: Hon. Vince Chhabria

Date Filed: October 2, 2024

1 Defendant Albert Collins (“Mr. Collins”) and the United States of America (“United
2 States”) hereby stipulate and agree as follows:

3 WHEREAS the United States filed a motion to dismiss a Form 12 on October 2, 2024,
4 Dkt. 86;

5 WHEREAS the deadline for Mr. Collins to file any response is currently set for October
6 16, 2024, Dkt. 75;

7 WHEREAS counsel for Mr. Collins is currently in trial before the Hon. Edward Davila
8 and expects to be in trial through the end of October;

9 WHEREAS the Defendant is out of custody and this Court indicated at the September 4,
10 2024 status conference that it was willing to entertain a request for an extension of the deadlines
11 related to the government’s motion to dismiss; and

12 WHEREAS the Court’s calendar indicates that it is available in November 2024;

13 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties that

14 1. The deadline for Mr. Collins to file any response to the government’s motion to
15 dismiss shall be extended to November 6, 2024.

16 2. The October 30, 2024 status conference shall be re-set for November 13, 2024, or
17 a date thereafter at the Court’s convenience.

18 Dated: October 14, 2024

ISMAIL J. RAMSEY
United States Attorney

19
20 By: /s/ Christine Chen
21 CHRISTINE CHEN
22 Special Assistant United States Attorney
23 Attorney for the United States

24 Dated: October 14, 2024

KEKER, VAN NEST & PETERS LLP

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26 By: /s/ Cody Gray
27 CODY GRAY
28 Attorney for Defendant
Albert Collins

CONCURRENCE

I, Cody Gray, am the user whose ID and password are being used to file this
STIPULATION AND [PROPOSED] ORDER TO CONTINUE MTD DEADLINES. I hereby
attest that each of the signatories has concurred in the filing of this document and has authorized
the use of his or her electronic signature.

Dated: October 14, 2024

By: /s/ Cody Gray

~~PROPOSED~~ ORDER

THE FOREGOING STIPULATION IS APPROVED AND SO ORDERED.

Dated: October 15, 2024

By: 
HON. VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE